

3. Claire Holland has been unresponsive to date, and because of that lack of response, counsel for the U.S. Government asserts that, in order to finalize a settlement, the United States Government will require that all parties, including Claire Holland, to sign off on any settlement, and that if that cannot be accomplished, the U.S. Government will request that her potential claim be terminated by an order of the Court.

4. Counsel for Frank Amodeo disputes the U.S. Government's assertions and preconditions for settlement of the case as stated in paragraph 3 above.

5. Counsel for Plaintiff and counsel for the U.S. Government each approve and have signed this status report. Although they understand that counsel for Frank Amodeo is in general agreement with the content of this report, they were unable to obtain final approval from him, so his signature is not affixed below.

Respectfully submitted by the Parties this 21st day of January, 2016.

/s Christopher F. Heinss

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